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Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	Case No. F04-0010 CR (RRB)
	)	
Plaintiff,	)	<b>DEFENDANTS' UNOPPOSED</b>
	)	<b>MOTION FOR LEAVE TO TRAVEL</b>
vs.	)	<b>OUT OF STATE</b>
	)	
RAYMOND F. WEGNER and	)	
JULIE M. WEGNER,	)	
	)	
Defendants.	)	
_____	)	

Defendants Raymond F. Wegner and Julie M. Wegner, by and through their counsel undersigned, respectfully move this Court for an order modifying the conditions of their release.

AS GROUNDS THEREFOR, Defendants state:

1. Defendants are currently out on bail.
2. As a condition of their release, defendants may not travel beyond the borders of the District of Alaska.
3. Defendants are in full compliance with all pre-trial conditions and United States Probation Officer Toni Ostanik does not oppose Defendants' request to travel outside of the

District of Alaska to Michigan, between November 15 through November 20, 2006 to attend Mr. Wegner's son's wedding in Michigan.

4. The government does not oppose the instant motion.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order modifying the conditions of their release by authorizing them to travel outside the District of Alaska to Michigan, between November 15 through November 20, 2006.

RESPECTFULLY SUBMITTED, this 12<sup>th</sup> day of October, 2006.

WILLIAM A. COHAN, P.C.

By: /s/

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Attorney for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of October, 2006, I served a true and correct copy of the foregoing **DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO TRAVEL OUT OF STATE**, upon the following via the CM/ECF system as follows:

TIMOTHY M. BURGESS  
United States Attorney  
STEPHEN COOPER  
Assistant U.S. Attorney  
Federal Building & U.S. Courthouse  
101 12<sup>th</sup> Avenue, Box 2, Room 310  
Fairbanks, Alaska 99701

Toni Ostanik, USPO  
United States Probation Office  
101 - 12<sup>th</sup> Avenue, Room 322  
Fairbanks, Alaska 99701

**Courtesy Copy:**

HON. RALPH R. BEISTLINE  
United States Federal Building  
222 West 7<sup>th</sup> Avenue  
Anchorage, Alaska 99513

/s/ \_\_\_\_\_  
Alicia Cisneroz